

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

KIARA MOORE,	)	Case No. 3:22-cv-00965
	)	
Plaintiff,	)	
	)	Judge Trauger
v.	)	
	)	<b>UNOPPOSED ADMINISTRATIVE MOTION</b>
MOUNT ZION BAPTIST CHURCH,	)	<b>TO FILE UNDER SEAL</b>
JOSEPH W. WALKER, III, and	)	
STEPHAINE WALKER,	)	
	)	
Defendant.	)	

Plaintiff Kiara Moore (“Plaintiff”) submits this Unopposed Administrative Motion to File Under Seal pursuant to Local Rules 5.03 and 7.01, Section 5.07 of Administrative Order No. 167-1, and the Stipulated Confidentiality Agreement And Order (“Protective Order”) (Docket No. 21).

**I. Plaintiff Conditionally Lodges Under Seal Documents Which Contain Confidential Or Privileged Information**

On October 20, 2023, the Parties notified this Court that they “executed a Term Sheet that resolves Plaintiff’s claims against all named Defendants,” and that “the Parties have and continue to work expeditiously to prepare and execute a formal settlement agreement.” (Docket No. 59.) On October 23, 2023, this Court issued an Order requiring “that a stipulation of dismissal or other settlement document shall be filed within thirty (30) days.” (Docket No. 60.) On October 24, 2023, the Parties executed a formal settlement agreement (the “Settlement Agreement”). The terms of the Settlement Agreement are confidential.

Plaintiff hereby notifies the Court that she has conditionally filed six (6) documents under seal in connection with Plaintiff's Motion for Attorneys' Fees and Reimbursement of Expenses ("Fee Petition"):

1. Plaintiff's Memorandum in Support of Motion for Attorneys' Fees and Reimbursement of Expenses (the "Memorandum");
2. Declaration of Kiara Moore in Support of Plaintiff's Motion for Attorneys' Fees and Reimbursement of Expenses ("Plaintiff Decl.");
3. Declaration of William D. Harris II in Support of Plaintiff's Motion for Attorneys' Fees and Reimbursement of Expenses ("Harris Decl.");
4. The Settlement Agreement, which is attached as **Exhibit A** to the Harris Decl.;
5. The billing records and expenses for Harris Legal Advisors LLC ("HLA Billing Records"), which are attached as **Exhibit H** to the Harris Decl.; and
6. The billing records and expenses for Sherrard Roe Voigt & Harbison, PLC, ("SRVH Billing Records") which are attached as **Exhibit I** to the Sabis Decl.

## **II. The Terms of the Settlement Agreement Are Confidential**

The Parties have agreed to keep the terms of the Settlement Agreement confidential. Pursuant to the Court's October 23, 2023 Order (Docket No. 60), the Settlement Agreement is attached as **Exhibit A** to the Declaration of William D. Harris II In Support of this Unopposed Administrative Motion to Seal ("Harris Seal Decl.") so that it may be reviewed *in camera* by the Court. However, because the terms are confidential, the Settlement Agreement was not filed publicly with the Fee Petition. Rather, a slip sheet stating that **Exhibit A** to the Harris Decl. was "Filed Under Seal."

The Memorandum, Plaintiff Decl., and Harris Decl., were redacted to the extent they would otherwise disclose one or more terms of the Settlement Agreement, or otherwise contain information that could be used to ascertain one or more terms of the Settlement Agreement.

**III. The HLA Billing Records and SRVH Billing Records Contain Information Protected from Disclosure by the Attorney-Client Privilege**

“[I]nformation covered by a recognized privilege (such as the attorney-client privilege) ... is typically enough to overcome the presumption of public access.” Local Rule 5.03(a). Plaintiff’s Counsel submitted their detailed billing records in support of the Fee Petition. The HLA Billing Records and SRVH Billing Records contain detailed time records which describe communications between Plaintiff and her Counsel. This information is protected from disclosure by the attorney-client privilege. The HLA Billing Records and SRVH Billing Records submitted with the Fee Petition have been redacted to preserve the attorney-client privilege.

**IV. The Memo and Plaintiff Decl. Contain Confidential Information about Plaintiff’s Income**

Plaintiff Decl. and the Memorandum identify the amount of Plaintiff’s annual income prior to the Adverse Employment Action giving rise to this litigation. *See* First Amended Complaint, Docket No. 28, at ¶ 42. This information has been redacted from Plaintiff Decl. and the Memorandum to protect Plaintiff’s confidential information.

This Motion is also based on the information set forth in the Harris Seal Decl., filed concurrently herewith.

Dated: November 17, 2023

Respectfully Submitted,

/s/ Christopher C. Sabis

Christopher C. Sabis (Bar No. 030032)  
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